DEC 9 2002

Mr. James F. Colburn
EG&G Defense Materials

Mr. Thaddeus A. Ryba, Jr.
Acting TOCDF Site Project Manager
Department of the Army
Program Manager for Chemical Demilitarization
Tooele Chemical Agent Disposal Facility
11620 Stark Road
Tooele, UT 84074

Dear Messrs. Colburn and Ryba:

As requested in your letter dated November 18, 2002, the National Program Chemicals Division (NPCD) of the U.S. Environmental Protection Agency (EPA) grants the U.S. Army Program Manager for Chemical Demilitarization (PMCD), Aberdeen Proving Ground, Maryland, an extension of the Toxic Substance Control Act (TSCA) PCB Disposal Demonstration Test Burn Approval dated April 19, 2002, which expires December 31, 2002. This approval authorizes the initiation of PCB Disposal operations exclusively at the Tooele Chemical Agent Disposal Facility (TOCDF) located at the South Area of the Tooele Army Depot, Tooele, Utah, for start-up and shake-down operations and to perform the TSCA PCB Disposal Demonstration Test Burn on M55 Rockets containing nerve agent VX. As requested, this approval is extended to June 30, 2003. In addition, TOCDF plans to demonstrate high-temperature operating conditions for M55 Rockets and low-temperature conditions for M56 Rocket Warheads, both packaged with shipping tubes containing PCBs and, therefore, regulated under TSCA. The national TSCA PCB Disposal Approval precludes operations at low temperatures. By this letter, NPCD grants TOCDF approval to process M56 Rocket Warheads containing VX nerve agent using low-temperature conditions under terms outlined below.

This approval for TOCDF to demonstrate the processing of M56 Rocket Warheads under low-temperature conditions will require TOCDF to provide: (1) submission to NPCD the Trial Burn Plan for the M56 Rocket Warhead at least eight weeks prior to the initiation of the trial burn; (2) opportunity for NPCD to comment on the trial burn plan; (3) opportunity for NPCD to observe the M56 Rocket Warhead trial burn; and (4) submission of the final report of the trial burn test results for the M56 Rocket Warheads to NPCD. Subsequently, NPCD will review the

CONCURRENCES

SYMBOL	7404T	7404T	7404T					
SURNAME	Dodhara	Bans	Cook					
DATE	12/5/02	12/5/02	12/9/02					

operating conditions outlined in the national permit and consider amending the permit conditions, where appropriate, to apply to TOCDF and other chemical disposal facilities.

If further assistance is needed on technical issues, please contact Hiroshi Dodohara at (202) 566-0507.

Sincerely,

Brion T. Cook, Acting Director
National Program Chemicals Division

cc: EPA Regional PCB Coordinator
Regions I - X

DEPARTMENT OF THE ARMY
PROGRAM MANAGER FOR CHEMICAL DEMILITARIZATION
TOOELE CHEMICAL AGENT DISPOSAL FACILITY
11620 STARK ROAD
TOOELE, UTAH 84074

REPLY TO
ATTENTION OF

November 18, 2002

Tooele Chemical Agent Disposal Facility PM-20873

SUBJECT: Request for Extension of Approval to Perform Toxic Substance Control Act (TSCA) Demonstration Burn on the Deactivation Furnace System (DFS)

Mr. David J. Kling, Acting Deputy Dir., OPPT
US Environmental Protection Agency
EPA East Building
1201 Constitution Ave. NW, Room #3166D
Washington, D.C. 20460

Dear Mr. Kling:

TOCDF is requesting an extension to the approval to perform a Toxic Substance Control Act (TSCA) Polychlorinated Biphenyl (PCB) Disposal Demonstration Test Burn. The current approval expires on December 31, 2002 (see attached EPA correspondence dated April 19, 2002). TOCDF requests an extension of the effective date of the approval to June 30, 2003.

This extension request is based on the following:

1. On July 15, 2002 an individual was exposed to Agent GB while performing maintenance on Liquid Incinerator 2 (LIC2). At the time of the incident, TOCDF was in the process of preparing the plant for the start of the Agent VX campaign. The combined Deactivation Furnace System (DFS) Resource Conservation and Recovery Act (RCRA) VX Agent Trial Burn (ATB)/TSCA Demonstration Burn was to occur at the beginning of the Agent VX campaign. One result of the agent exposure incident was the curtailment of physical activities associated with preparation for the Agent VX campaign. The time required to perform the subsequent investigations and to address the required corrective actions will cause the start date of the combined DFS RCRA VX ATB/TSCA Demonstration Burn to occur after the TSCA Demonstration Burn approval expiration date of December 31, 2002.

2. M55 Rockets and M56 Warheads are considered Polychlorinated Biphenyl (PCB) articles based on the concentration of PCBs found in their shipping/firing tubes. M55 Rockets and M56 Warheads will be used as feeds during the combined RCRA VX ATB/TSCA Demonstration Burn.

The DFS will process the rockets, rocket warheads, projectile bursters and VX landmines throughout the VX campaign. Rockets and rocket warheads were chosen as RCRA VX ATB/TSCA Demonstration Burn waste feeds to demonstrate and establish an operating envelope that will also permit the incineration of projectile bursters and landmines. Demonstration of a high-temperature condition using rockets as feed and of a low-temperature condition using rocket warheads as feed are planned. Operating parameter conditions specified in the national TSCA permit issued June 6, 2002, prevent successful execution of the low-temperature condition. The low-temperature condition is necessary for munitions processed through the DFS after completion of rocket operations.

Operating parameter limits demonstrated during the VX ATB will be in effect throughout the entire Agent VX campaign. The conditions afforded by the TSCA Demonstration Burn Approval are more conducive to successfully completing both the high- and low-temperature conditions planned for the DFS VX ATB used to establish an operational envelope that permits the feeding of all VX munitions.

TOCDF will meet the requirement to comply with the DFS operating conditions specified in the permit issued to the Department of the Army titled "Approval to Dispose of the PCBs" upon completion of the TSCA Demonstration Burn.

If you have any questions, the point of contact is Mr. Richard M. Snell at (435)833-7483 or Mr. Monte S. Caldwell at (435)833-7428.

Sincerely,

James F. Colburn
EG&G Defense Materials
*CERTIFICATION STATEMENT

Thaddeus A. Ryba, Jr.
TOCDF Deputy Site Project Manager
*CERTIFICATION STATEMENT

Enclosure

Copies Furnished:

Mr. Dan Bench, US EPA Region 8
Mr. Dennis Downs, DSHW
Joseph S. Stang
Kristine Snow
File

* I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF TH PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

GIND3-0679

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 19 2002

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. James L. Bacon
Department of the Army
Program Manager for Chemical Demilitarization
Aberdeen Proving Ground, MD 21010-5401

Dear Mr. Bacon:

The National Program Chemicals Division (NPCD) of the Environmental Protection Agency (EPA) grants the U.S. Army Program Manager for Chemical Demilitarization, Aberdeen Proving Ground, Maryland (PMCD) approval to initiate PCB Disposal operations exclusively at the Tooele Chemical Agent Disposal Facility (TOCDF) located at the South Area of the Tooele Army Depot, Tooele, Utah, for startup and shakedown operations and to perform the TSCA PCB Disposal Demonstration Test Burn on M55 Rockets containing nerve agent VX. The demonstration tests shall be performed at the Deactivation Furnace System of the TOCDF. NPCD has reviewed the Demonstration Test Plan and the Operating Permit Applications dated July 1993 and subsequent submissions, and has determined that the information contained in the documents is acceptable for initiation of PCB Disposal Demonstration Test Burn and that the tests will pose no unreasonable risk of injury to health and the environment. This approval is not a final approval for operation of this facility.

Enclosed is a document entitled "Approval to Dispose of Polychlorinated Biphenyls (PCBs) in the Deactivation Furnace of the Chemical Agent Disposal System," for the TSCA Demonstration Test Burn (Enclosure) for purposes of conducting the demonstration test burn on no more than two thousand (2,000) M55 rockets. Effective dates for this approval are from May 1, 2002 through December 31, 2002.

As part of the program to complete the disposal of chemical weapons stockpile at TOCDF, the Army needs to initiate startup and shakedown of the DFS with the processing of chemical weapons containing the nerve agent VX. At the end of the shakedown, the Army intends to perform the VX Agent Demonstration Test Burn on a limited number of M55 Rockets.

Regarding interim operations (i.e., operations after the test burn), TOCDF has indicated that the Demonstration Test Burn Report would require fifteen weeks to prepare for submission after completion of the Demonstration Test Burn. During those fifteen weeks of interim operations, EPA believes that all remaining M55 VX nerve agent rockets containing PCBs at the Deseret Storage Depot would be disposed of in TOCDF. By this letter, NPCD grants approval for five calendar weeks of interim operations (Phase 1) after the completion of an operationally

successful VX Rocket PCB Disposal Demonstration. Approval for this phase of the Interim Operations Approval is issued based on the data submission for the 1998 Trial Burn. EPA may approve an additional ten calendar weeks of interim operations (Phase 2) if all requirements of Condition 9 of this approval are met. Complete submissions, as determined by NPCD, from the Demonstration Test Burn shall be received by EPA at least ten calendar days prior to the start of the ten calendar week extension of Interim Operations.

A destruction and removal efficiency (DRE) of 99.9999% is a requisite for approval of a TSCA operating permit. To calculate DRE for the tests, the Army must add all PCB values quantified as well as estimating values for PCBs below the practical limit of quantitation (PLQ). Those PCB homologues (levels of chlorination) which have no congeners detected equal to or greater than the PLQ must be estimated to be present at the PLQ concentration.

As part of the PCB sampling and monitoring procedures, NPCD is adding the requirement to analyze for three coplanar and seven mono-ortho co-planar PCB congeners. NPCD requires the Army to analyze stack samples for these ten congeners, which are listed in Condition 7 of the attached approval. For purposes of the DRE calculations, these ten congeners shall be measured and quantified just as the other PCB congeners are, and included as part of their respective homologues and total PCBs. For purposes of the calculation of the total 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) equivalents, quantities of these ten congeners equal to or above the PLQ must be multiplied by the toxicity equivalency factors (TEFs) listed in Condition 7, and added to the total TCDD equivalents. When these congeners are in homologues (levels of chlorination) which have no congeners detected equal to or greater than the PLQ, each congener must be estimated to be present at the PLQ concentration for their respective homologues, multiplied by the applicable TEFs, and then included in the TCDD equivalent total.

If further assistance is needed on technical issues, please contact Hiroshi Dodohara at (202) 260-3959.

Sincerely,

David J. Kling, Acting Deputy Director
Office of Pollution Prevention and Toxics

Enclosure

cc: EPA Regional Administrator
Regions I - X

EPA Regional PCB Coordinator
Regions I - X

OPB Files (3)